

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

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JACOB DOE

Plaintiff,

v.

No. 1:24-CV-41

**THE UNIVERSITY OF NORTH
CAROLINA SYSTEM, *et al.***

Defendants.

-----X

CERTIFICATION OF COMPLIANCE WITH FED. R. CIV. P. 65(B)

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, undersigned counsel for the plaintiff hereby certifies that the Temporary Restraining Order plaintiff seeks may be issued in compliance with the notice provisions of Rule 65(b) of the Federal Rules of Civil Procedure because:

(1) Plaintiff's Verified Complaint [ECF No. 1] sets out detailed and specific facts that clearly show immediate and irreparable injury, loss, or damage will result to the plaintiff before the adverse party can be heard in opposition; and

(2) Undersigned counsel hereby certifies that the Defendants to be enjoined have been provided with notice of plaintiff's motion for a temporary restraining order and the grounds therefore by delivering a copy of all papers now on file with the court in this action via electronic mail to Ms. Marla Spector Bowman, Esq., the University of North Carolina's in-house litigation counsel. These papers include the plaintiff's Verified Complaint, the plaintiff's motion for a temporary restraining order and a preliminary injunction, the

supporting memorandum of law, and the proposed temporary restraining order. Further, undersigned counsel conferred with Ms. Bowman regarding the plaintiff's need for and intent to move for the injunctive relief sought in this action beginning roughly one week ago.

(3) Therefore, the notice requirements of Rule 65(b) of the Federal Rules of Civil Procedure for the issuance of a Temporary Restraining Order have been met.

Respectfully submitted this 17th day of January 2024, by:

EKSTRAND & EKSTRAND, LLP
Attorneys for Plaintiff

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